

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Mel Carnahan, Governor • Stephen M. Mahfood, Director

DIVISION OF ENVIRONMENTAL QUALITY  
P.O. Box 176 Jefferson City, MO 65102-0176

January 23, 1998

**CERTIFIED MAIL – Z 289 840 784**  
**RETURN RECEIPT REQUESTED**

Mr. Thomas S. Sanicola  
Environmental Engineer  
Modine Manufacturing Company  
1500 DeKoven Avenue  
Racine, WI 53403

**RE: Modine Manufacturing Company, Camdenton, Missouri**  
**Comprehensive Groundwater Monitoring Evaluation Report**

Dear Mr. Sanicola:

A Comprehensive Groundwater Monitoring Evaluation (CME) Report concerning the groundwater monitoring program at Modine Manufacturing Company (Modine) in Camdenton, Missouri, has been prepared by the Missouri Department of Natural Resources' (MDNR) Hazardous Waste Program (HWP). A copy of this report is enclosed.

The report evaluates several aspects of site groundwater monitoring, including:  
1) The site-specific Sampling and Analysis Plan (SAP); 2) The well sampling procedures as observed during a split-sampling event; and 3) The physical integrity of the groundwater monitoring wells.

This letter serves as notice that groundwater monitoring deficiencies do exist at the Modine, Camdenton, Missouri, facility which must be addressed to comply with the requirements of 40 CFR Part 265 Subpart F. Topically, these deficiencies relate to: 1) execution of sampling procedures; 2) maintenance of groundwater monitoring wells; 3) adequacy of the groundwater monitoring well network to determine the rate and extent of groundwater contamination at the facility. Cited deficiencies are based on a field audit of Modine's groundwater sampling and measurement procedures; inspection of Modine's groundwater monitoring wells, comparison of Modine's and MDNR's split-sampling results; and comprehensive review of Modine's historical corrective action and voluntary field investigation reports.



R00065041  
RCRA Records Center

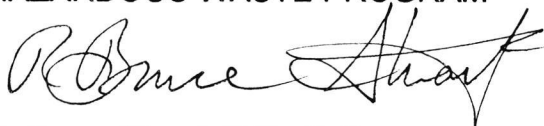
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A summary of noted CME deficiencies is presented in Section VI, "CONCLUSIONS," beginning on page 39 of the CME Report. Please submit to the HWP's Groundwater Unit, in the Permits Section, within 30 days of receipt of this letter, a response and/or a schedule of responses to the groundwater monitoring program deficiencies summarized in the CME report.

If you have any questions, please do not hesitate to contact Ms. Chris Kump, of my staff, at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM

A handwritten signature in black ink, appearing to read "R. Bruce Stuart". The signature is fluid and cursive, with a large initial "R" and a stylized "S" at the end.

R. Bruce Stuart, P.E., R.G.  
Chief, Groundwater Unit  
Permits Section

RBS:ckb

Enclosure

c: Mr. William A. Spratlin, U.S. EPA Region VII  
MDNR, Jefferson City Regional Office